

**Exhibit I**  
**Emails re Supplemental Production**

## Suzanne Elovecky

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**From:** Kate Klaus <KKlaus@maddinhauser.com>  
**Sent:** Monday, June 26, 2023 3:59 PM  
**To:** Suzanne Elovecky; Cooper, Howard; Cacace, Joseph  
**Cc:** Neil Nicholson  
**Subject:** [EXTERNAL] RE: de Laire v. St. Michael's Media/Rule 26(e) Supplemental Production

The text was not sent directly to Marc, but through two intermediaries, because Mr. Voris does not have a way of contacting Marc directly. There are no additional texts between Marc and Mr. Voris on a "thread" that I'm aware of and I'll confirm that with Mr. Voris. It was sent on June 15 of this year.

There are no documents constituting a "digital fingerprint" demonstrating that Marc directly loaded the document into CM's system. The computer system shows the "owner" of the article is [tommooore@churchmilitant.com](mailto:tommooore@churchmilitant.com). There is no document that can be printed that demonstrates this, but they can take a picture of the screen. I'll bates number and send that.

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**From:** Suzanne Elovecky <selovecky@psh.com>  
**Sent:** Monday, June 26, 2023 3:43 PM  
**To:** Kate Klaus <KKlaus@maddinhauser.com>; Cooper, Howard <hcooper@toddweld.com>; Cacace, Joseph <jcacace@toddweld.com>  
**Cc:** Neil Nicholson <neil@nicholson-lawfirm.com>  
**Subject:** RE: de Laire v. St. Michael's Media/Rule 26(e) Supplemental Production  
**Importance:** High

[EXTERNAL EMAIL]

Kate,

We are still discussing your request concerning your expert's testimony. I am leaning toward a trial deposition for purposes of our cross, but I will get back to you with our final decision shortly.

Concerning this production, while I see that your description of the production is true for the most part, the final page in your production certainly falls into a different category and has prompted further questions.

First, the date on the text from Voris to Balestrieri has no year. Can you please supply the year of that the text was sent?

Second, we had requested documents (doc Req. Nos. 29, 30, 31) reflecting the transmission of the article from Balestrieri to Church Militant, none were produced, and at Voris's deposition we were told there were no such documents, and that Balestrieri uploaded the text directly onto the web interface. Now this text message reflects that your client has located documents that bear Balestrieri's "digital fingerprints" in connection with the article. Nevertheless, your production today is limited to emails from 2018, and do not include the referenced "receipts" that Voris states he has.

When will those be produced, in addition to any further texts in the thread indicated at CM1470?



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**From:** Kate Klaus <[KKlaus@maddinhauser.com](mailto:KKlaus@maddinhauser.com)>  
**Sent:** Monday, June 26, 2023 12:16 PM  
**To:** Suzanne Elovecky <[selovecky@psh.com](mailto:selovecky@psh.com)>; Cooper, Howard <[hcooper@toddweld.com](mailto:hcooper@toddweld.com)>; Cacace, Joseph <[jcacace@toddweld.com](mailto:jcacace@toddweld.com)>  
**Cc:** Neil Nicholson <[neil@nicholson-lawfirm.com](mailto:neil@nicholson-lawfirm.com)>  
**Subject:** [EXTERNAL] de Laire v. St. Michael's Media/Rule 26(e) Supplemental Production

Attached are CM 1336-1462, documents we're producing under Rule 26(e). The emails are those in which Marc Balesterieri used a pseudonym "tommoore." The emails are response to your Document Request 30; they are all from 2018 and none relate to Fr. de Laire, the articles or this case.

Have you decided whether you object to our expert testifying through video conference?

Thanks,

Kate

**Kate Klaus**  
Shareholder



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